

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re:	:	Case No. 22-51185
Leo Neal, Jr.	:	Chapter 13
Debtor	:	Judge Nami Khorrami

**TRUSTEE’S OBJECTION TO APPLICATION FOR PAYMENT OF UNCLAIMED
FUNDS FILED BY BRUCE SQUIRE LAW, LLC (Doc. 340)**

Now comes Edward A. Bailey, Chapter 13 Trustee (Trustee”), and hereby files his Objection to the Application for Payment of Unclaimed Funds (Doc. 340) filed by Bruce Squire Law, LLC (“Movant”). In its application, Movant asserts that it is an assignee of Debtor Leo Neal, Jr. and requests the release of \$46,378.40 from this case that is currently being held by the Registry Fund.

The Trustee objects to the subject application because he believes that the Application for Payment of Unclaimed Funds was filed fraudulently and is an attempt by whoever filed the application to defraud the Court.

Initially, the Trustee notes that the application was purported to be filed by Bruce Squire, as owner of Bruce Squire Law, LLC. Said application was submitted to the clerk via Certified Mail. The Trustee believes that if the Movant were truly an attorney, the application would have been filed through the Court’s CM/ECF System.

Additionally, the Trustee notes that the Supporting Documents (Doc. 341) filed with the subject application includes many inconsistencies that would not be expected from a competent attorney. First, the purported “Assignment of Interest in Unclaimed Funds” includes numerous font and spacing changes throughout the document. Second, the document includes a signature,

telephone number, and email address for Debtor that do not match the information provided in the Trustee's records. Third, the purported driver's license of Bruce Squire appears to be a poorly photoshopped image of a headshot of the real Mr. Squire that easily be found through a simple search on google.com. The alleged license also includes a residence address that is located more than two hours away from the business address alleged in the application. Fourth, handwritten dates on the "Affidavit of Photo Identification Authenticity" uses a DD/MM/YYYY format, a format used in many foreign countries that differs from the MM/DD/YYYY format typically used in the United States; indicating that whoever submitted the subject application is not familiar with the dating format used in the United States and is, therefore, not a practicing attorney from Tempe, Arizona. Fifth, the Ohio driver license, purported to be that of Debtor, includes a photograph of a person other than Debtor and includes information that the State of Ohio does not include on its driver's licenses. Finally, the Movant claims to be from Arizona; however, when using the tracking service of the United States Postal Service, the application in this case was mailed out of Flint, Michigan. **See Exhibit A.**

As a result of these suspicions, the Trustee's staff attorney called a telephone number associated with an Attorney Bruce Squire. The phone number was for a law firm for which Attorney Squire previously acted in an of-counsel capacity. Through a conversation with the office manager at that firm, Trustee Bailey's Staff Attorney was advised that Bruce Squire retired from practice about two years ago. Further, Trustee Bailey's counsel was advised that this is not the first case in which Mr. Squire's name has been used to fraudulently obtain funds from the Registry Fund as the office had received another call from a case originating from Los Angeles, California.

For the reasons set forth above, the Trustee believes that the Application for Payment of Unclaimed Funds in this matter was filed fraudulently and that neither Bruce Squire, nor

whomever filed the application using Bruce Squire's name, is entitled to any of the requested funds.

WHEREFORE, the Trustee respectfully objects to the Application for Payment of Unclaimed Funds (Doc. 340) filed herein and requests that said application be denied. Alternatively, the Trustee requests that requests a hearing before this honorable court before any orders granting said Application for Payment of Unclaimed Funds is entered by the court.

Respectfully submitted,

/s/ Edward A. Bailey by DTP (0076375)

Edward A. Bailey
Chapter 13 Trustee
550 Polaris Parkway, Suite 500
Westerville, Ohio 43082
(614) 436-6700
(614) 436-0190 (fax)
trustee@ch13.org

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Trustee's Objection to Payment of Unclaimed Funds was served (i) **electronically** on the date of filing through the court's ECF System on all ECF participants registered in this case at the email address registered with the court and (ii) by **ordinary U.S. Mail** on January 27, 2025, addressed to:

Leo Neal, Jr.
5174 Schuykill Street
Columbus, Ohio 43220

Bruce Squire Law, LLC
c/o Bruce Squire, Managing Member
4500 S. Lakeshore Drive, Ste. 368
Tempe, Arizona 85282

/s/ Edward A. Bailey by DTP (0076375)

Edward A. Bailey
Chapter 13 Trustee